

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IOWA PUBLIC EMPLOYEES'  
RETIREMENT SYSTEM, *et al.*,

Plaintiffs,  
v.

BANK OF AMERICA CORPORATION,  
*et al.*,

Defendants

Case No. 17-cv-6221 (KPF)

Hon. Katherine Polk Failla

**DECLARATION OF STEPHANIE J. FIERECK, ESQ. ON IMPLEMENTATION OF  
CAFA NOTICE**

I, STEPHANIE J. FIERECK, ESQ., hereby declare and state as follows:

1. My name is Stephanie J. Fiereck, Esq. I am over the age of 21 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a Legal Notice Manager for Epiq Class Action & Claims Solutions, Inc. ("Epiq"). I have been in my position as Legal Notice Manager since 2012. During that time I have overseen and handled Class Action Fairness Action ("CAFA") notice mailings for more than 325 class action settlements.

3. Epiq is a firm with more than 25 years of experience in claims processing and settlement administration. Epiq's class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service, claims database management, claim adjudication, funds management and distribution services.

4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

DECLARATION OF STEPHANIE J. FIERECK, ESQ. ON IMPLEMENTATION OF CAFA NOTICE

**CAFA NOTICE IMPLEMENTATION**

5. At the direction of counsel for the Defendants Credit Suisse Group AG, Credit Suisse AG, Credit Suisse Securities (USA) LLC, Credit Suisse First Boston Next Fund, Inc., and Credit Suisse Prime Securities Services (USA) LLC, 66 officials, which included the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia, and the United States Territories, one office of the NY Department of Financial Services, and eight offices of the Federal Reserve were identified to receive the CAFA notice.

6. Epiq maintains a list of these federal and state officials with contact information for the purpose of providing CAFA notice. Prior to mailing, the names and addresses selected from Epiq's list were verified, then run through the Coding Accuracy Support System ("CASS") maintained by the United States Postal Service ("USPS").<sup>1</sup>

7. On February 21, 2022, Epiq sent 66 CAFA Notice Packages ("Notice"). The Notice was mailed via USPS Certified Mail to 64 officials, including the Attorneys General of each of the 50 states, the District of Columbia, and the United States Territories, one office of the NY Department of Financial Services, and seven state offices of the Federal Reserve. The Notice was also sent via United Parcel Service ("UPS") to two officials, including the Attorney General of the United States and one office of the Federal Reserve. The CAFA Notice Service List (USPS Certified Mail and UPS) is included as **Attachment 1**.

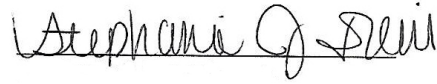
8. The materials sent to the federal and state officials included a cover letter, which provided notice of the proposed settlement of the above-captioned case. The cover letter is included as **Attachment 2**.

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<sup>1</sup> CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

9. The cover letter was accompanied by a CD, which included the following:
- a. **Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:** The following complaint amended complaint were included:
    1. Class Action Complaint (Aug. 16, 2017); and
    2. Amended Class Action Complaint (Nov. 17, 2017).
  - b. **Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:** The parties have not created, or submitted to the court for approval, notices of settlement at this time.
  - c. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** On January 20, 2022, after extensive arm’s length negotiations undertaken in good faith, counsel for plaintiffs Iowa Public Employees’ Retirement System; Los Angeles County Employees Retirement Association; Orange County Employees’ Retirement System; Sonoma County Employees’ Retirement Association; and Torus Capital, LLC (collectively, “Plaintiffs”) and the settlement class and counsel for Settling Defendants executed a Settlement Agreement (the “Settlement Agreement”). The Settlement Agreement was filed with the Court on February 11, 2022, together with Plaintiffs’ motion for preliminary approval of the settlement. In addition to the Settlement Agreement, the following supporting documents were included:
    1. Notice of Plaintiffs’ Motion for Preliminary Approval of the Settlement Agreement with Credit Suisse;
    2. Memorandum of Law in Support of Plaintiffs’ Motion for Preliminary Approval of the Settlement Agreement with Credit Suisse;
    3. Declaration of Daniel L. Brockett in Support of Plaintiffs’ Motion for Preliminary Approval of the Settlement Agreement with Credit Suisse;
      - Exhibit 1 – Settlement Agreement (with exhibits);
      - Exhibit 2 – Quinn Emanuel Urquhart & Sullivan, LLP’s Firm Resume;
      - Exhibit 3 – Cohen Milstein Sellers & Toll PLLC’s Firm Resume;
      - Exhibit 4 – Epiq Class Action & Claims Solutions, Inc.’s Firm Resume; and
    4. [Proposed] Order Preliminarily Approving Settlement Agreement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 22, 2022.

A handwritten signature in black ink, appearing to read "Stephanie J. Fiereck". The signature is written in a cursive, flowing style.

Stephanie J. Fiereck, Esq.

# Attachment 1

CAFA Notice Service List

UPS

Company	FullName	Address1	Address2	City	State	Zip
US Department of Justice	Merrick B. Garland	950 Pennsylvania Ave NW		Washington	DC	20530
Federal Reserve	Michael Gibson	Director of Supervision & Regulation	20th Street and Constitution Ave NW	Washington	DC	20551

## CAFA Notice Service List

## USPS Certified Mail

Company	FullName	Address1	Address2	City	State	Zip
Office of the Attorney General	Treg Taylor	PO Box 110300		Juneau	AK	99811
Office of the Attorney General	Steve Marshall	501 Washington Ave		Montgomery	AL	36104
Office of the Attorney General	Leslie Carol Rutledge	323 Center St	Suite 200	Little Rock	AR	72201
Office of the Attorney General	Mark Brnovich	2005 N Central Ave		Phoenix	AZ	85004
Office of the Attorney General	CAFA Coordinator	Consumer Law Section	455 Golden Gate Ave Ste 11000	San Francisco	CA	94102
Office of the Attorney General	Phil Weiser	Ralph L. Carr Colorado Judicial Center	1300 Broadway 10th Fl	Denver	CO	80203
Office of the Attorney General	William Tong	165 Capitol Ave		Hartford	CT	06106
Office of the Attorney General	Karl A. Racine	400 6th St NW		Washington	DC	20001
Office of the Attorney General	Kathy Jennings	Carvel State Office Bldg	820 N French St	Wilmington	DE	19801
Office of the Attorney General	Ashley Moody	State of Florida	The Capitol PL-01	Tallahassee	FL	32399
Office of the Attorney General	Chris Carr	40 Capitol Square SW		Atlanta	GA	30334
Department of the Attorney General	Holly T. Shikada	425 Queen St		Honolulu	HI	96813
Iowa Attorney General	Thomas J Miller	1305 E Walnut St		Des Moines	IA	50319
Office of the Attorney General	Lawrence G Wasden	700 W Jefferson St Ste 210	PO Box 83720	Boise	ID	83720
Office of the Attorney General	Kwame Raoul	100 W Randolph St		Chicago	IL	60601
Indiana Attorney General's Office	Todd Rokita	Indiana Government Center South	302 W Washington St 5th Fl	Indianapolis	IN	46204
Office of the Attorney General	Derek Schmidt	120 SW 10th Ave 2nd Fl		Topeka	KS	66612
Office of the Attorney General	Daniel Cameron	700 Capitol Avenue	Suite 118	Frankfort	KY	40601
Office of the Attorney General	Jeff Landry	PO Box 94005		Baton Rouge	LA	70804
Office of the Attorney General	Maura Healey	1 Ashburton Pl		Boston	MA	02108
Office of the Attorney General	Brian E. Frosh	200 St Paul Pl		Baltimore	MD	21202
Office of the Attorney General	Aaron Frey	6 State House Station		Augusta	ME	04333
Department of Attorney General	Dana Nessel	PO Box 30212		Lansing	MI	48909
Office of the Attorney General	Keith Ellison	445 Minnesota St	Suite 1400	St Paul	MN	55101
Missouri Attorney General's Office	Eric Schmitt	207 West High Street	PO Box 899	Jefferson City	MO	65102
MS Attorney General's Office	Lynn Fitch	Walter Sillers Bldg	550 High St Ste 1200	Jackson	MS	39201
Office of the Attorney General	Austin Knudsen	215 N Sanders Third Floor	PO Box 201401	Helena	MT	59620
Attorney General's Office	Josh Stein	9001 Mail Service Ctr		Raleigh	NC	27699
Office of the Attorney General	Wayne Stenehjem	State Capitol	600 E Boulevard Ave Dept 125	Bismarck	ND	58505
Nebraska Attorney General	Doug Peterson	2115 State Capitol	PO Box 98920	Lincoln	NE	68509
Office of the Attorney General	John Formella	NH Department of Justice	33 Capitol St	Concord	NH	03301
Office of the Attorney General	Andrew J. Bruck	25 Market Street	PO Box 080	Trenton	NJ	08625
Office of the Attorney General	Hector Balderas	408 Galisteo St	Villagra Bldg	Santa Fe	NM	87501
Office of the Attorney General	Aaron Ford	100 N Carson St		Carson City	NV	89701
Office of the Attorney General	CAFA Coordinator	28 Liberty Street	15th Floor	New York	NY	10005
Office of the Attorney General	Dave Yost	30 East Broad Street	14th Floor	Columbus	OH	43215
Office of the Attorney General	John O'Connor	313 NE 21st St		Oklahoma City	OK	73105
Office of the Attorney General	Ellen F Rosenblum	Oregon Department of Justice	1162 Court St NE	Salem	OR	97301
Office of the Attorney General	Josh Shapiro	16th Fl Strawberry Square		Harrisburg	PA	17120
Office of the Attorney General	Peter F Neronha	150 S Main St		Providence	RI	02903
Office of the Attorney General	Alan Wilson	PO Box 11549		Columbia	SC	29211
Office of the Attorney General	Jason Ravnsborg	1302 E Hwy 14 Ste 1		Pierre	SD	57501
Office of the Attorney General	Herbert H. Slatery III	PO Box 20207		Nashville	TN	37202
Office of the Attorney General	Ken Paxton	300 W 15th St		Austin	TX	78701
Office of the Attorney General	Sean D. Reyes	PO Box 142320		Salt Lake City	UT	84114
Office of the Attorney General	Mark R. Herring	202 North Ninth Street		Richmond	VA	23219
Office of the Attorney General	TJ Donovan	109 State St		Montpelier	VT	05609
Office of the Attorney General	Bob Ferguson	800 Fifth Avenue	Suite 2000	Seattle	WA	98104
Office of the Attorney General	Josh Kaul	PO Box 7857		Madison	WI	53707
Office of the Attorney General	Patrick Morrisey	State Capitol Complex	Bldg 1 Room E 26	Charleston	WV	25305
Office of the Attorney General	Bridget Hill	109 State Capital		Cheyenne	WY	82002
Department of Legal Affairs	Fainu'ulei Falefatu Ala'ilima-Utu	Executive Office Building 3rd Floor	PO Box 7	Utulei	AS	96799
Attorney General Office of Guam	Leevin T Camacho	Administration Division	590 S Marine Corps Dr Ste 901	Tamuning	GU	96913
Office of the Attorney General	Edward Manibusan	Administration Bldg	PO Box 10007	Saipan	MP	96950
PR Department of Justice	Domingo Emanuelli Hernández	PO Box 9020192		San Juan	PR	00902
Department of Justice	Denise N. George	34-38 Kronprindsens Gade	GERS Bldg 2nd Fl	St Thomas	VI	00802
Federal Reserve Bank of Atlanta	Richard A. Jones	Senior VP and General Counsel	1000 Peachtree Street NE	Atlanta	GA	30309
Federal Reserve Bank of Boston	Kenneth C. Montgomery	Interim President and Chief Executive Officer	600 Atlantic Avenue	Boston	MA	02210
Federal Reserve Bank of Chicago	Katherine Schrepfer	Office of the General Counsel	230 South LaSalle Street	Chicago	IL	60604
Federal Reserve Bank of Dallas	David K. Teeple	Vice President - Deputy General Counsel	2200 N. Pearl St.	Dallas	TX	75201
Federal Reserve Bank of New York	Michael Held	General Counsel and Executive VP	33 Liberty Street	New York	NY	10045
Federal Reserve Bank of Richmond	Michelle Gluck	Executive VP - General Counsel and CRO	PO Box 27622	Richmond	VA	23261
Federal Reserve Bank of San Francisco	Laura Monfredini	General Counsel and Senior VP	101 Market Street PO Box 7702	San Francisco	CA	94120
NY Department of Financial Services	Adrienne Harris	Acting Superintendent	One State Street	New York	NY	10004



# Attachment 2

**CAFA NOTICE ADMINISTRATOR**  
HILSOFT NOTIFICATIONS  
10300 SW Allen Blvd  
Beaverton, OR 97005  
P 503-350-5800  
DL-CAFA@epiqglobal.com

February 21, 2022

**VIA UPS OR USPS CERTIFIED MAIL**

**Class Action Fairness Act – Notice to Federal and State Officials**

Dear Federal and State Officials:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), codified at 28 U.S.C. § 1715, please find enclosed information from Defendants Credit Suisse Group AG, Credit Suisse AG, Credit Suisse Securities (USA) LLC, Credit Suisse First Boston Next Fund, Inc., and Credit Suisse Prime Securities Services (USA) LLC (collectively, “Settling Defendants”) relating to the proposed settlement of a class action lawsuit.

- **Case:** *Iowa Public Employees’ Retirement System, et al. v. Bank of America Corporation, et al.* (17-CV-06221) (KPF).
- **Court:** United States District Court for the Southern District of New York.
- **Defendants:** Credit Suisse Group AG, Credit Suisse AG, Credit Suisse Securities (USA) LLC, Credit Suisse First Boston Next Fund, Inc., and Credit Suisse Prime Securities Services (USA) LLC.
- **Documents Enclosed:** In accordance with the requirements of 28 U.S.C. § 1715, please find copies of the following documents associated with this action on the enclosed CD:
  1. **Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:** The following complaint and amended complaint are included:
    - Class Action Complaint (Aug. 16, 2017); and
    - Amended Class Action Complaint (Nov. 17, 2017).
  2. **Per 28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The Court has not scheduled a preliminary approval hearing or a final approval hearing or any other judicial hearing concerning the settlement agreement at this time.
  3. **Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:** The parties have not created, or submitted to the court for approval, notices of settlement at this time.
  4. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** On January 20, 2022, after extensive arm’s length negotiations undertaken in good faith, counsel for plaintiffs Iowa Public Employees’ Retirement System; Los Angeles County Employees Retirement Association; Orange County Employees’ Retirement System; Sonoma County Employees’ Retirement Association; and Torus Capital, LLC (collectively, “Plaintiffs”) and the settlement class and counsel for Settling Defendants executed a Settlement

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HILSOFT NOTIFICATIONS  
10300 SW Allen Blvd  
Beaverton, OR 97005  
P 503-350-5800  
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Agreement (the “Settlement Agreement”). The Settlement Agreement was filed with the Court on February 11, 2022, together with Plaintiffs’ motion for preliminary approval of the settlement. In addition to the Settlement Agreement, the following supporting documents are included:

- Notice of Plaintiffs’ Motion for Preliminary Approval of the Settlement Agreement with Credit Suisse;
  - Memorandum of Law in Support of Plaintiffs’ Motion for Preliminary Approval of the Settlement Agreement with Credit Suisse;
  - Declaration of Daniel L. Brockett in Support of Plaintiffs’ Motion for Preliminary Approval of the Settlement Agreement with Credit Suisse;
    - Exhibit 1 – Settlement Agreement (with exhibits);
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    - Exhibit 3 – Cohen Milstein Sellers & Toll PLLC’s Firm Resume;
    - Exhibit 4 – Epiq Class Action & Claims Solutions, Inc.’s Firm Resume; and
  - [Proposed] Order Preliminarily Approving Settlement Agreement.
5. **Per 28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** There is no other Settlement or Agreement.
  6. **Per 28 U.S.C. § 1715(b)(6) – Final Judgment or Notice of Dismissal:** To date, the Court has not issued a final order, judgment or dismissal in the above-referenced action.
  7. **Per 28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** Settling Defendants cannot feasibly identify the names of all class members who reside in each state and the estimated proportionate share of the claims of such members to the entire settlement. Because the class includes persons or entities who entered into one or more transactions with all defendants, Settling Defendants do not have an independent basis to provide a reasonable estimate of the number of class members residing in each state or the estimated proportionate share of the claims of such members to the entire settlement.
  8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** To date, the Court has not issued a final order or judgment in the above-referenced action.

If you have questions or concerns about this notice or the enclosed materials, please contact this office.

Very truly yours,

CAFA Notice Administrator

Enclosures